IN THE UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13

WILLIE JAMES PHILLIPS, JR :

AKA WILLIE JAMES PHILLIPS; FDBA: CASE NO. 1:13-bk-01095

PHILLIPS COMMERCIAL CLEANING:

Debtor

:

MOTION TO MODIFY PLAN

COMES NOW the Debtor, by and through Kara K. Gendron, Esquire of Mott & Gendron Law, and moves to amend the Chapter 13 Plan, respectfully stating in support thereof as follows:

- 1. The Debtor filed a Chapter 13 Bankruptcy Petition on March 4, 2013.
- 2. The Debtor obtained a loan modification and seeks to amend his plan accordingly and pay attorney fees through the amended plan.

WHEREFORE, the Debtor moves to modify the plan as provided in the Amended Plan.

Respectfully submitted,

/s/ Kara K. Gendron

Kara K. Gendron, Esquire Attorney ID #: 87577 Mott & Gendron Law 125 State Street Harrisburg, PA 17101 (717) 232–6650 TEL (717) 232-0477 FAX karagendron@gmail.com

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Commercial Cleaning :

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ORDER

UPON CONSIDERATION of the Motion to Modify Plan, and cause appearing therefore, it is hereby

ORDERED AND DECREED that the Debtor is granted leave to Modify the Chapter 13 Plan and the Plan is hereby modified.